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International Cell Surgical Society, Cell
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Attorney for Defendants KATE
KRAWCZYK, an individual and
PHYSICIAN ROI, LLC, a Delaware Limited
Liability Company.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

INTERNATIONAL CELL SURGICAL
SOCIETY, a California Public Benefit Nonprofit
Corporation,
CELL SURGICAL NETWORK
CORPORATION, a California Corporation,
CALIFORNIA STEM CELL TREATMENT
CENTER, INC., a California Corporation,

Plaintiffs,

v.

KATE KRAWCZYK, an individual,
PHYSICIAN ROI, LLC, a Delaware Limited
Liability Company, and
DOES 1 through 40, inclusive

Defendants.

CASE NO. 5:23-cv-00698-DOC-KK

**STIPULATION AND JOINT
REQUEST TO FURTHER
CONTINUE DEFENDANTS'
DEADLINE TO FILE A RESPONSIVE
PLEADING PENDING MEDIATION**

Complaint Filed: 03/02/2023

Current Deadline: 06/17/2023

Proposed Deadline: 08/16/2023

1 Plaintiffs INTERNATIONAL CELL SURGICAL SOCIETY, CELL SURGICAL
2 NETWORK CORPORATION, a California Corporation, and CALIFORNIA STEM CELL
3 TREATMENT CENTER, INC., a California Corporation (“**Plaintiffs**”) and Defendants KATE
4 KRAWCZYK, an individual and PHYSICIAN ROI, LLC a Delaware Limited Liability
5 Company (“**Defendants**”) (**collectively “the Parties”**) HEREBY STIPULATE AND AGREE,
6 and respectfully request that the Court ORDER, that Defendants’ deadline to file a pleading in
7 response to Plaintiffs’ Complaint in this matter, currently 06/17/2023, be further continued for
8 60 days to 08/16/2023.

9 The grounds for this request are that the parties have been engaged in substantial,
10 genuine, good faith settlement discussions directed toward resolution of the matter without
11 further expenditure of the Court’s or parties’ resources. However, the parties have concluded
12 that further settlement discussions without the involvement of a neutral third party would be
13 unproductive. Accordingly, the parties have agreed and wish to participate in voluntary
14 mediation.

15 The parties believe that a continuance of 60 days would afford sufficient, but not
16 excessive, time to engage a mediation service, develop and submit a joint statement of facts,
17 have a mediator assigned, and schedule and prepare for a mediation.

18 In the interest of limiting expenditure of the Court’s and parties’ resources while the
19 parties endeavor to reach mutually agreeable terms for settlement through mediation, it is
20 stipulated and agreed, and respectfully requested, that Defendants’ deadline to file a responsive
21 pleading be continued for 60 days, to 08/16/2023.

22 Respectfully submitted:

23 Dated: 06/13/2023

Law Offices of Marvin H. Weiss

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26 By: /S/ MARVIN H. WEISS/
27 Marvin H. Weiss, Attorney for Plaintiffs
International Cell Surgical Society;

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JOINT REQUEST TO CONTINUE DEADLINE FOR DEFENDANTS’
RESPONSIVE PLEADING PENDING MEDIATION

CELL SURGICAL NETWORK CORPORATION,
a California Corporation;
and CALIFORNIA STEM CELL TREATMENT
CENTER, INC.

Dated: 06/13/2023

Law Office of Lillian Kkosravi

By: /s/ LILLIAN H. KHOSRAVI /
Lillian Khosravi, Esq., Attorney for Defendants
KATE KRAWCZYK, an individual and
PHYSICIAN ROI, LLC, a Delaware Limited
Liability Company